UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

VINCENT PACE,)
Plaintiff,))
v) Cause No: 4:07-CV-1851-CDP
THE WELLPOINT COMPANIES, INC ,)
Defendant)

MEMORANDUM IN SUPPORT OF MOTION FOR SANCTIONS

For all the reasons stated in Defendant's Motion for Sanctions, Defendant respectfully requests that its Motion for Sanctions be granted.

Respectfully submitted,

LEWIS, RICE & FINGERSH, L.C.

By: /s/David W. Gearhart

Gary M. Smith, #10613

David W. Gearhart, #102100

500 North Broadway, Suite 2000

St. Louis, Missouri 63102

(314) 444-7600

Fax (314) 241-6056

Attorneys for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Memorandum in Support of Motion for Sanctions was filed electronically with the Clerk of Court this 22nd day of April 2008, to be served by operation of the Court's electronic filing system upon the following:

Lyell Champagne
The Champagne Law Firm
The Frisco Building
906 Olive Street, Suite 915
St Louis, MO 63101
Attorney for Plaintiff

/s/David W. Gearhart	